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ILLINOIS COMMERCE COMMISSION

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MENARD ELECTRIC COOPERATIVE ,  
an Illinois not-for-profit corporation, and  
CENTRAL ILLINOIS PUBLIC SERVICE  
COMPANY d/b/a AmerenCIPS, an Illinois  
corporation.

Joint Petition for Approval of Partial Service  
Area Agreements dated May 14, 2007,  
Between Menard Electric Cooperative and  
Central Illinois Public Service Company  
d/b/a AmerenCIPS relating to property owned  
by Faye Koke Trust Property and Northern  
Agricultural, LLC

DOCKET NO:

07-0317

**STIPULATED MOTION FOR A PAPER HEARING**

NOW COMES the parties, Central Illinois Public Service Company d/b/a AmerenCIPS ("AmerenCIPS"), by Brown, Hay & Stephens, LLP, Scott C. Helmholz and Richard S. Wolters, and Menard Electric Cooperative ("MEC"), and hereby seek leave to conduct the above-captioned proceedings as a Paper Hearing pursuant to 83 Ill.Admin.Code §200.525. In support of this request, the parties state as follows:

1. The parties have filed a Joint Petition under Section 6 of the Electric Supplier Act (220 ILCS 30/6), seeking approval of a Partial Service Area Agreement between the parties.

2. Attached to the Petition is a true and correct copy of the parties' Partial Service Area Agreement (marked for identification purposes as "Joint Exhibit 1") which contains a map identified as Appendix A to Joint Exhibit 1 that identifies the premises of the Faye Koke Trust which MEC shall have authority to serve for the sole purpose of providing electric service to an irrigation system.

3. Also attached to this Petition is a true and correct copy of the parties' Partial Service Area Agreement (marked for identification purposes as "Joint Exhibit 3") which contains a map identified as Appendix A to Joint Exhibit 3 that identifies Northern Agricultural, LLC which

AmerenCIPS shall have the authority to serve for the sole purpose of providing electric service to an irrigation system.

4. The Rules of Practice of the Illinois Commerce Commission permit the parties and Staff participating in a proceeding to stipulate to the waiver of a hearing and to the resolution of the matter based solely on the written pleadings and affidavits in a process called a Paper Hearing (83 Ill.Admin.Code §200.525(a)). Such a stipulation may be filed at any time prior to the date the Administrative Law Judge marks the case Heard and Taken (83 Ill.Admin.Code §200.525(d)). The stipulation is subject to the approval of all parties, Staff and the Administrative Law Judge (83 Ill.Admin.Code §200.525(b)).

5. The parties agree that a Paper Hearing would be an efficient means of resolving the Joint Petition, as it appears there are no areas of controversy.

6. Attached hereto and marked for identification purposes as Joint Stipulation Exhibit A, is a stipulation to be signed by the Staff member in the event one is assigned to this docket prior to the preparation of an order for Commission consideration. In the event no Staff member is assigned, both signatories to this Stipulation expressly waive the necessity of having Staff review this Petition and/or file a Staff Stipulation.

7. An affidavit supporting the Stipulation and Exhibits is attached hereto and marked for identification as Joint Stipulation Exhibit B.

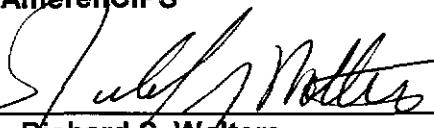
8. A Draft Order prepared by AmerenCIPS and provided to and reviewed by MEC is attached as Joint Stipulation Exhibit C.

WHEREFORE, the parties request that this proceeding be conducted as a Paper Hearing.

**Menard Electric Cooperative**

By:   
Lynn Frasco  
General Manager

**Central Illinois Public Service Company  
d/b/a AmerenCIPS**

By:   
Richard S. Wolters  
Attorney for AmerenCIPS

**BROWN, HAY & STEPHENS, LLP**

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Lynn Frasco  
General Manager  
Menard Electric Cooperative  
14300 State Highway 97  
P.O. Box 200  
Petersburg, IL 62675

State of Illinois )  
County of Sangamon )ss

I, **Lynn Frasco**, as **General Manager of Menard Electric Cooperative**, have read the foregoing Stipulated Motion for a Paper Hearing filed in the above cause, know the content thereof and know the same is true to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
**LYNN FRASCO**

Subscribed and sworn to before me this 24 day of April, 2007.



  
\_\_\_\_\_  
**Notary Public**

State of Illinois )  
 )ss  
County of Sangamon )

I, **Richard S. Wolters**, as **Attorney for AmerenCIPS**, have read the foregoing Stipulated Motion for a Paper Hearing filed in the above cause, know the content thereof and know the same is true to the best of my knowledge, information and belief.

  
**RICHARD S. WOLTERS**

Subscribed and sworn to before me this 17<sup>th</sup> day of May, 2007.

